

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO

In re:)
) Case No. 15-13442
Carol Davis)
) Chapter 13
)
Debtor.) Judge Pat E. Morgenstern-Claren

OBJECTION TO MORTGAGE PAYMENT CHANGE FILED APRIL 4, 2017

Now comes the Debtor, Carol Davis, through counsel Claudia FitzGerald, and objects to the notice of mortgage payment increase. Ms. Davis' proof of insurance policy was provided to Shellpoint Mortgage Servicing by State Farm Fire and Casualty Company on April 19, 2017. The current Chapter 13 plan pays the crammed down mortgage in full through the plan. The insurance and taxes are being paid directly by the debtor. The mortgage payment including escrowed insurance and taxes should be disallowed.

WHEREFORE the payment change filed on April 4, 2017 should be disallowed.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

A copy of the foregoing was served on April 20, 2017 on the following registered CM/ECF participants, electronically through the Court's transmission facilities at their e-mail addresses listed

on the Court's Electronic Mail Notice List:

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/s/Claudia P. FitzGerald